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**From:** Coate, Carson [Coate.Carson@epa.gov]  
**Sent:** 10/29/2015 2:59:18 PM  
**To:** Vranka, Joe [vranka.joe@epa.gov]; Land, Kelcey [Land.Kelcey@epa.gov]; Parker, Robert [Parker.Robert@epa.gov]; Wilder, Scott [Wilder.Scott@epa.gov]; Piggott, Amelia [Piggott.Amelia@epa.gov]  
**Subject:** FW: CFAC/Calbag Violation letter (FID 2386 / CVID 18794) 2nd of 2 emails  
**Attachments:** CFAC In-process material sampling results TCLP submttd to MDEQ part 2.pdf

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**From:** Steve Wright [mailto:swright@cfaluminum.com]  
**Sent:** Wednesday, October 28, 2015 10:25 AM  
**To:** Rieger, Michael <MRieger@mt.gov>  
**Cc:** Coate, Carson <Coate.Carson@epa.gov>; jim.perris@calbag.com; Joe Russell <jrussell@flathead.mt.gov>; mahall@mt.gov; Mikita, Cory <CMikita@mt.gov>; ethamke@mt.gov; Schmidt, Carol <CSchmidt3@mt.gov>; Mullen, Norman <nmullen@mt.gov>; Haque-Hausrath, Katherine <KHaqueHausrath@mt.gov>; Hendrickson, Mary <MHendrickson@mt.gov>; rithompson@mt.gov; Cliff Boyd <cliff.boyd@calbag.com>  
**Subject:** RE: CFAC/Calbag Violation letter (FID 2386 / CVID 18794) 2nd of 2 emails

Mike-

Attached are additional analytical results referenced in my previous email

Steve Wright

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**From:** Steve Wright  
**Sent:** Wednesday, October 28, 2015 10:24 AM  
**To:** 'Rieger, Michael'  
**Cc:** 'coate.carson@epa.gov'; 'jim.perris@calbag.com'; 'Joe Russell'; 'Hall, Mark (DEQ)'; 'Mikita, Cory'; 'Thamke, Ed'; 'Schmidt, Carol'; 'Mullen, Norman'; 'Haque-Hausrath, Katherine'; 'Hendrickson, Mary'; 'Thompson, Ricknold'; 'Cliff Boyd'  
**Subject:** RE: CFAC/Calbag Violation letter (FID 2386 / CVID 18794) 1st of 2 emails

Mike,

I am in the process of reviewing your Oct. 26 letter. I don't know if you are aware of prior testing of materials at CFAC, so as an initial matter, I thought I would bring you up to date by providing you with the attached analyses showing the CFAC materials did not test hazardous. I will also send a second email with additional attached analysis; my first email to you bounced because of attachment size.

With respect to the anode carbon and aluminum busbar, which have economic value, I do not see how these could be a waste under the ARM 17.50.502(41).

Thank you for providing your recommendations and I will discuss with Calbag.

Steve Wright

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**From:** Rieger, Michael [mailto:MRieger@mt.gov]  
**Sent:** Monday, October 26, 2015 9:07 AM  
**To:** Cliff Boyd; Steve Wright  
**Cc:** Rieger, Michael; coate.carson@epa.gov; jim.perris@calbag.com; Joe Russell; Hall, Mark (DEQ); Mikita, Cory; Thamke, Ed; Schmidt, Carol; Mullen, Norman; Haque-Hausrath, Katherine; Hendrickson, Mary; Thompson, Ricknold  
**Subject:** CFAC/Calbag Violation letter (FID 2386 / CVID 18794)

Cliff & Steve,

Attached for your convenience is a copy of my violation letter. Hard copies will be sent in the mail today. Please contact me with any questions or comments.

Mike Rieger  
Enforcement Division  
Department of Environmental Quality  
Phone: (406) 444-3937  
Fax: (406) 444-1923  
[mrieger@mt.gov](mailto:mrieger@mt.gov)